

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
-vs-)	CASE NO. CR-20-183-HE
)	
BLAKE LAWRENCE KRETCHMAR,)	
)	
Defendant.)	

**UNOPPOSED MOTION FOR ORDER CONTINUING
JURY TRIAL AND MOTION DEADLINE**

COMES NOW, the Defendant, Blake Lawrence Kretchmar, through counsel and request this Honorable Court to issue its order continuing the Jury Trial in the above styled cause. In furtherance thereof, the Defendant Kretchmar would show this Court as follows, to-wit:

1. On July 21, 2020, the Grand Jury in the United States District Court for the Western District of Oklahoma issued a ten count indictment, alleging conversion of property pledged to a Farm Credit Agency against the above named Defendant. Thereafter, Defendant Kretchmar appeared in this Court on August 4, 2020, for arraignment.

2. This matter is currently scheduled for trial during the November 2020, trial docket.

3. There has been one previous continuance of trial for Defendant and counsel to engage in trial preparation, review of discovery and to obtain an expert witness. The time relating to the previous continuance was excluded under the Speedy Trial Act.

4. Counsel is still in the process of attempting to locate an expert witness to assist as a consultant and/or expert witness.

5. Counsel notes that the United States District Court for the Western District of Oklahoma on October 16, 2020 issued G.O. 20-22 relating to the limited number of jury trials that will be conducted during the November 2020 docket. Due to the current state of the ongoing worldwide pandemic (COVID19) counsel is requesting that this matter be reset by the presiding judge to a docket after the November 2020 docket.

6. As noted in G.O. 20-22, counsel for the Defendant Kretchmar request this Court enter its order granting a continuance of the jury trial in the above styled cause based on the finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A).

7. Counsel is authorized to state that he has visited with Assistant United States Attorney, Ms. K. McKenzie Anderson and she does not oppose the Court's continuing the jury trial to another trial docket.

WHEREFORE, the foregoing premises considered, Defendant Kretchmar requests this Court find that the ends of justice outweighs the interest of the public and this Defendant in a speedy trial. Any delay as a result of a continuance of jury is excluded from the computation of time for purposes of calculating time pursuant to the Speedy Trial Act.

Respectfully submitted.
MARTIN LAW OFFICE

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ATTORNEYS FOR DEFENDANT
Blake Lawrence Kretchmar

CERTIFICATE OF SERVICE

I hereby certify that on Monday, October 19, 2020, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants: Ms. K. McKenzie Anderson, Assistant United States Attorney.

/s/ Mack K. Martin
Mack K. Martin

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